

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**DEBRA BROWN,**

Plaintiff,

Case No.

Hon.

v.

**MORO'S DINING, INC., and  
THOMAS MORO,**

Defendants.

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**GOLD STAR LAW, P.C.**

**Caitlin E. Malhiot (P76606)**

**Maia J. Braun (P40533)**

Attorneys for Plaintiff

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**COMPLAINT AND JURY DEMAND**

**COMPLAINT**

Plaintiff, Debra Brown, through her attorneys, Gold Star Law, P.C.,  
for her Complaint states:

**PARTIES, JURISDICTION AND VENUE**

1. Plaintiff, Debra Brown ("Brown"), is an individual who resides in  
Southgate, Wayne County, Michigan.

2. Defendant, Moro's Dining, Inc. ("Moro's Dining"), is a Michigan Domestic Profit Corporation that conducts business in Allen Park, Wayne County, Michigan.

3. Defendant, Thomas Moro, is an individual conducting business in Allen Park, Wayne County, Michigan.

4. The violations of Title VII of the Civil Rights Act of 1964 alleged herein occurred in the Eastern District of Michigan.

5. This action arises under 42 U.S.C. 2000e *et seq.*, and jurisdiction of this Court is proper under 28 USC 1331.

6. Defendants reside within this judicial district, and venue is proper in this Court pursuant to 28 USC 1391(b).

### **FACTUAL ALLEGATIONS**

7. Defendant Moro's Dining is a restaurant in Allen Park, Michigan.

8. Defendant Thomas Moro is the owner, president, and registered agent of Moro's Dining.

9. Brown began working for Defendants in 1988.

10. Brown was most recently employed by Defendants as a kitchen manager.

11. Beginning in or before 2016, Brown was subjected to severe and pervasive sexual harassment from Thomas Moro on an almost daily basis.

12. Thomas Moro would grab Brown's breasts, buttocks, and genital area.

13. Thomas Moro would make unwanted sexual comments to Brown including "you gave me a hard on" and telling Brown that he wanted to "suck on her titties."

14. Thomas Moro told Brown that if she would "put out", he would take her to Hawaii.

15. Thomas Moro would also tell Brown that he likes to hire prostitutes and describe the sexual activities in which he engaged with them.

16. Brown repeatedly asked Thomas Moro to stop his harassing behavior.

17. On at least one occasion Thomas Moro said to Brown, "What are you going to do, sue me for sexual harassment?"

18. This unwanted sexual harassment continued until August 13, 2018 when Thomas Moro terminated Brown's employment.

19. On August 29, 2018, Brown filed a charge of discrimination based on sex with the Equal Employment Opportunity Commission ("EEOC").

20. The EEOC closed its file on Brown's charge and issued a Dismissal and Notice of Suit Rights to Plaintiff on December 8, 2020. Dismissal and Notice of Suit Rights is attached as Exhibit 1.

**CAUSE OF ACTION-  
SEXUAL HARASSMENT IN VIOLATION OF TITLE VII  
OF THE CIVIL RIGHTS ACT OF 1964**

21. Plaintiff incorporates the above allegations as though fully stated herein.

22. Defendants are “employers” within the coverage of Title VII of the Civil Rights Act of 1964 (“Title VII”).

23. Plaintiff is an “employee” within the coverage of Title VII.

24. Defendants violated Section 703 of Title VII by tolerating and promoting a hostile work environment of severe and pervasive sexual harassment.

25. As a direct and proximate result of Defendant’s wrongful and unlawful conduct, Plaintiff has sustained damages, including emotional distress.

**WHEREFORE,** Plaintiff requests judgment against Defendant for emotional damages in an amount to be proven at trial, together with her costs and reasonable attorney fees incurred herein, and such other relief as the Court deems just and equitable.

Respectfully submitted,

**GOLD STAR LAW, P.C.**

/s/ Caitlin E. Malhiot  
**Caitlin E. Malhiot (P76606)**  
**Maia J. Braun (P40533)**  
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Date: January 26, 2021

**JURY DEMAND**

Plaintiff, Debra Brown, hereby demands a trial by jury in this action.

Respectfully submitted,

**GOLD STAR LAW, P.C.**

/s/Caitlin E. Malhiot  
**Caitlin E. Malhiot (P76606)**  
**Maia J. Braun (P40533)**  
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Date: January 26, 2021